

**ADDENDUM TO FACT SHEET FOR  
MODIFICATION TO NPDES PERMIT WA-003134-8  
PUGLIA ENGINEERING, INC.**

The Puglia Engineering National Pollutant Discharge Elimination System permit WA-003134-8 requires compliance with surface water quality criteria by September 1, 2003, and the submission of an engineering report to meet this requirement by December 1, 2002. Puglia appealed the permit requesting:

1. granting a mixing zone,
2. extending the compliance schedule for the engineering report submission, and
3. extending the date to meet water quality criteria.

During the time of the appeal on August 24, 2004, Tamara Archer of the Bellingham Field Office found that Puglia discharged to Bellingham Bay industrial stormwater without authorization through vents or drains in the drydock.

The permit requires a design to collect and treat all industrial stormwater including the drydock vents to meet water quality criteria up to the 10-year 24-hour design storm. This design will also protect the 303d listed sediments from Puglia's contaminated stormwater discharges. The Department proposes to grant a mixing zone for discharges during periods exceeding this precipitation event.

The permit also extends the compliance schedule for attainment of the criteria to September 1, 2005. In the interim period, performance-based effluent limitations are established as AKART. After the compliance period, surface water quality-based effluent limitations are established taking into account the mixing zone dilution ratio for the approximately one discharge that will occur in a ten-year period.

Puglia's preferred alternative is discharge to the sanitary system. The Department approved the engineering report for discharge to the City of Bellingham sewage treatment plant.

The permit also specifically prohibits all stormwater discharges from the drydock while a vessel is on the drydock including but not limited to vents, ports, scuppers, and drains.

**PUBLIC NOTICE**

The proposed changes to this permit are considered a major modification under 40 CFR 122.62. Consequently, the draft permit modification is required to be published for a thirty (30)-day public review and comment period. The Department published a Public Notice of Draft Permit Modification on April 19, 2005, in the *Bellingham Herald*. No comments were received.

### Surface Water Quality Limit 1

Dilution (Dil'n) factor is the inverse of the percent effluent concentration at the edge of the acute or chronic mixing zone.

#### Permit Limit Calculation Summary

PARAMETER	Acute Dil'n Factor	Chronic Dil'n Factor	Metal Criteria Translator	Metal Criteria Translator	Ambient Concentration	Water Quality Standard		Average Monthly Limit (AML)		Maximum Daily Limit (MDL)		Comments
			Acute	Chronic	ug/L	Acute	Chronic	ug/L	ug/L	ug/L	ug/L	
Copper	85.0	640	0.83	0.83	0.0100	4,8000	3,1000	336.3	490.6			
Zinc	85	640	0.946	0.946	0.01	90	81	5542.7	8085.8			

#### Waste Load Allocation (WLA) and Long Term Average (LTA) Calculations

WLA Acute	WLA Chronic	LTA Acute	LTA Chronic	LTA Coeff. Var. (CV)	LTA Prob'y Basis	Limiting LTA	Statistical variables for permit limit calculation			
							Coeff. Var. (CV)	AML Prob'y Basis	MDL Prob'y Basis	# of Samples per Month
ug/L	ug/L	ug/L	ug/L	decimal	decimal	ug/L	decimal	decimal	decimal	n
407	1977.61	130.7	1043.1	0.60	0.99	130.7	0.60	0.95	0.99	1.00
7649	51833.61	2456.0	27338.8	0.60	0.99	2456.0	0.60	0.95	0.99	1.00

This spreadsheet calculates water quality-based permit limits based on the two value steady state model using the State Water Quality Standards contained in WAC 173-201A. The procedure and calculations are done per the procedure in Technical Support Document for Water Quality-based Toxics Control, U.S. EPA, March 1991 (EPA/505/2-90-001) on page 99. Last revision date 9/98. Written by G. Shervette

**Performance-based Limit 1**

Copper											
PERFORMANCE-BASED EFFLUENT LIMITS											
EXCEL TO PERFORM THE LOGNORMAL TRANSFORMATION											
CALCULATE THE TRANSFORMED MEAN AND VARIANCE											